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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

KAREN HUYCK,)	Case No.: 3:15-cv-01298-BR
)	
Plaintiff,)	JOINT MOTION TO LIFT STAY
v.)	and DISBURSE FUNDS
LIMITLESS, LLC, an Oregon limited)	Pursuant to FRCP 62(d) and LR 67
liability company,)	
)	
Defendant.)	

MOTION

Pursuant to the Parties' settlement of this Lawsuit, the Parties hereby jointly move this Court for an Order lifting the stay of execution of Judgment imposed by this Court on May 2, 2017 [Docket #79], and disbursing the cash collateral currently held in this court's treasury registry as provided below.

LEGAL MEMORANDUM

On May 2, 2017, this Court issued a stay of the Judgment in this case so that Defendant Limitless LLC could appeal that Judgment. The Parties having now settled this Lawsuit, and the appellate court having dismissed the appeal pursuant to the Parties' settlement agreement, the Parties now move this Court to lift the above-referenced stay so that the cash collateral held in this Court's treasury registry can be disbursed as required by the Parties' settlement agreement.

Once the stay has been lifted, the parties jointly move the Court for an Order disbursing the \$9,700.00 cash collateral deposited by Defendant Limitless LLC in accordance with this Court's April 21, 2017, Order [Docket #75] as follows:

- \$9,513.26 to "Karen Huyck", c/o attorney Jon M. Egan, 547 Fifth Street, Lake Oswego, OR 97034-3009; and
- The remaining \$186.74 to "Laura Bush", the sole Member of Defendant Limitless LLC, c/o attorney Jeremy Fellows, 14845 S.W. Murray Scholls Dr. Suite #110, PMB 605, Beaverton, OR 97007.

DATED this September 4, 2018.

s/ Jeremy L. Fellows
Jeremy L. Fellows, OSB #831945
Attorney for Defendant Limitless LLC

s/ Jon M. Egan
Jon M. Egan, OSB #002467
Attorney for Plaintiff Karen Huyck